

EXHIBIT D

From: [Anand, Nehal S.](#)
To: nahmad@ahmad-capodice.com
Cc: [MacDowall, Luke C.](#)
Subject: RE: Ruth Buzi v. Baylor College of Medicine
Date: Thursday, August 1, 2019 10:06:31 AM

Nasim,

We did not receive any documents or supplemental responses yesterday, despite your representation below. We served discovery requests in early May of this year; we granted multiple extensions on discovery responses; and plaintiff's responses were nevertheless entirely deficient. One month after we notified you about these deficiencies and our intent to file a motion to compel, we still have not received a single supplemental response or document. We also have not received any of the signed authorizations we requested from Plaintiff in order to obtain necessary third party records.

Plaintiff's interrogatories fail to provide any substantive responses, even to standard requests related to plaintiff's employment and damages. Likewise, Plaintiff lodged boilerplate objections to the requests for production without producing substantive documents that are very likely in plaintiff's possession. There is no good faith basis for these deficiencies. This has greatly delayed our ability to proceed forward with discovery and depositions. Please provide all responsive documents and supplemental interrogatory responses, including signed authorizations, by close of business tomorrow. At this point, we cannot afford to take the "wait and see" approach you suggest below. If we do not receive the documents and information that we requested by tomorrow, we will assume that Plaintiff intends to stand by her objections and will seek judicial relief on any remaining items (and seek our fees for such efforts).

Nehal

Nehal Anand
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-----Original Message-----

From: nahmad@ahmad-capodice.com <nahmad@ahmad-capodice.com>
Sent: Wednesday, July 31, 2019 9:03 AM
To: Anand, Nehal S. <NAand@littler.com>
Cc: MacDowall, Luke C. <LMacDowall@littler.com>
Subject: Re: Ruth Buzi v. Baylor College of Medicine

Hi Nehal,

I've got additional documentation to supplement, which I will get to you later today. After you've had a chance to review, let's touch base tomorrow and let me know if there is anything else that you feel you don't have.

I appreciate your patience and I will be in touch. Thank you.

Nasim

On 2019-07-26 16:45, Anand, Nehal S. wrote:

> Nasim,
>
> We have not received a single response to our letter from July 3,
> which asked for complete discovery responses by July 12. If we do
> not receive the information and documents requested by close of
> business on Tuesday, we will file a motion to compel with the Court
> and will indicate that Plaintiff is "opposed" to the motion.
>
> Nehal
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>
> FROM: Saenz, Monica L. <MSaenz@littler.com>
> SENT: Wednesday, July 3, 2019 5:07 PM
> TO: nahmad@ahmad-capodice.com
> CC: Anand, Nehal S. <NAnand@littler.com>; MacDowall, Luke C.
> <LMacDowall@littler.com>
> SUBJECT: Ruth Buzi v. Baylor College of Medicine
>
> Please see attached correspondence from Mr. MacDowall.
>
> Thank you.
>
> MONICA SAENZ
> Legal Secretary
> 713.652.4767 direct
> MSaenz@littler.com
>
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